

Buchanan

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April 4, 2024

BY ECF AND E-MAIL

Hon. Harvey Bartle III
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106

Re: Daniel's Law Cases Identified on the Attached Schedule A

Dear Judge Bartle:

This firm represents Trans Union LLC, Neustar, Inc., and TransUnion Risk and Alternative Data Solutions, Inc. in *Atlas Data Privacy Corp., et al. v. Trans Union LLC, et al.*, No. 24-cv-04288, as well as Zillow, Inc. and Zillow Group, Inc. in *Atlas Data Privacy Corp., et al. v. Zillow, Inc., et al.*, No. 24-cv-04256. We write on behalf of them as well as Defendants Black Knight Technologies, LLC, Telnyx LLC, People Data Labs, Inc., Scalable Commerce, LLC, Civil Data Research, LLC, National Data Analytics, LLC, Digital Safety Products, LLC, RE/MAX, LLC, DM Group, Inc., Deluxe Corporation, Enformion, LLC, Enformion, Inc., Red Violet, Inc., Acxiom, LLC, Remine Inc., CoreLogic, Inc., AtData, LLC, Whitepages, Inc., Hiya Inc., 6Sense Insights, Inc., Search Quarry, LLC, Carco Group, Inc., Intellicorp Records, Inc., Quantarium Alliance, LLC, Twilio Inc., Labels & Lists, Inc., TelTech Systems, Inc., Choreograph LLC, Spokeo, Inc., GoHunt, LLC, Wiland, Inc., We Inform, LLC, The People Searchers, LLC, Informatics LLC, Commercial Real Estate Exchange, Inc., Lusha Systems, Inc., Claritas LLC, PeopleConnect, Inc., PeopleConnect Holdings, Inc., PeopleConnect Intermediate, LLC, Intelius, Inc., CoStar Group, Inc., CoStar Realty Information, Inc., Oracle International Corporation, Oracle America, Incorporated, Oracle Corporation, LightBox Parent, L.P., LightBox Holdings, L.P., and Melissa Data Corp. regarding the Order entered by Chief Judge Chagares on April 2, 2024 which designated and assigned your Honor to the nearly 60 matters listed in the attached Schedule A.¹

¹ Plaintiffs filed nearly 150 separate cases in New Jersey Superior Court. Not all of the defendants in those cases have been served. We therefore anticipate that additional Defendants may file notices of removal and that those removed cases also will be assigned to your Honor. Defendants respectfully request that any stay also be entered in any related, removed case.

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Defendants respectfully request a status conference at the Court's earliest convenience to discuss an orderly approach to case management across these matters, including, among other things, responses to the vast number of individual complaints, each of which currently have different deadlines, and whether Plaintiffs intend to move to remand in some of the pending cases. Defendants understand that your Honor has scheduled a telephonic conference on April 8, 2024 in *Atlas Data Privacy Corp. v. Blackbaud, Inc., et al.*, No. 24-cv-3993 but respectfully submit that a conference to discuss all pending matters together would still be appropriate and helpful.

In advance of this requested joint status conference, Defendants also respectfully request that this Court enter an Order staying all proceedings and deadlines until further order of this Court considering the number of cases and parties involved and the need for an organized approach to case management. This will give the parties an opportunity to meet and confer on scheduling and other matters and report any agreements or disagreements to the Court in advance of the status conference and will avoid burdening the Court with what may be superfluous and duplicative motion practice. The first response date would otherwise be on April 9, 2024 (with additional response dates following soon thereafter).

If the Court prefers that the Defendants file a formal motion in connection with this request, Defendants will promptly do so upon the Court's instruction.

Defendants have attempted to meet and confer with Plaintiffs regarding this request. Plaintiffs did not substantively respond to Defendants' request.

Respectfully yours,

/s/ Jacqueline M. Weyand

Jacqueline M. Weyand

Samantha L. Southall
(application for *pro hac vice*
admission forthcoming)

Attachment

cc: Rajiv Parikh, Esq.
John Yanchunis, Esq.
Ryan McGee, Esq.
Mark Mao, Esq.
Counsel for Plaintiffs

SCHEDULE A

<u>CASE CAPTION</u>	<u>CASE NUMBER</u>
<i>Atlas Data Privacy Corp., et al. v. Whitepages, Inc., et al.</i>	3:24-cv-3998
<i>Atlas Data Privacy Corp., et al. v. Hiya, Inc., et al.</i>	3:24-cv-4000
<i>Atlas Data Privacy Corp., et al. v. Blackbaud Inc., et al.</i>	2:24-cv-3993
<i>Atlas Data Privacy Corp., et al. v. Infomatics LLC, et al.</i>	2:24-cv-4041
<i>Atlas Data Privacy Corp., et al. v. The People Searchers, LLC, et al.</i>	2:24-cv-4045
<i>Atlas Data Privacy Corp., et al. v. We Inform, LLC, et al.</i>	2:24-cv-4037
<i>Atlas Data Privacy Corp., et al. v. DM Group, Inc., et al.</i>	2:24-cv-4075
<i>Atlas Data Privacy Corp., et al. v. Deluxe Corp., et al.</i>	2:24-cv-4080
<i>Atlas Data Privacy Corp., et al. v. Cargo Group Inc., et al.</i>	2:24-cv-4077
<i>Atlas Data Privacy Corp., et al. v. Commercial Real Estate Exchange, Inc., et al.</i>	2:24-cv-4073
<i>Atlas Data Privacy Corp., et al. v. 6Sense Insights, Inc., et al.</i>	3:24-cv-4104
<i>Atlas Data Privacy Corp., et al. v. Costar Group, Inc., et al.</i>	2:24-cv-4111
<i>Atlas Data Privacy Corp., et al. v. Enformion, LLC, et al.</i>	2:24-cv-4110
<i>Atlas Data Privacy Corp., et al. v. Oracle Int'l Corp., et al.</i>	2:24-cv-4112
<i>Atlas Data Privacy Corp., et al. v. Quantarium Alliance, LLC, et al.</i>	2:24-cv-4098
<i>Atlas Data Privacy Corp., et al. v. RE/MAX, LLC, et al.</i>	2:24-cv-4114
<i>Atlas Data Privacy Corp., et al. v. Red Violet, Inc., et al.</i>	3:24-cv-4113
<i>Atlas Data Privacy Corp., et al. v. Search Quarry, LLC, et al.</i>	3:24-cv-4106
<i>Atlas Data Privacy Corp., et al. v. Yardi Sys., Inc., et al.</i>	2:24-cv-4103
<i>Atlas Data Privacy Corp., et al. v. Acxiom LLC, et al.</i>	3:24-cv-4107
<i>Atlas Data Privacy Corp., et al. v. Lightbox Parent, L.P., et al.</i>	3:24-cv-4105
<i>Atlas Data Privacy Corp., et al. v. Delvepoint, LLC, et al.</i>	2:24-cv-4096
<i>Atlas Data Privacy Corp., et al. v. Twilio Inc., et al.</i>	2:24-cv-4095
<i>Atlas Data Privacy Corp., et al. v. Accurate Append, Inc., et al.</i>	3:24-cv-4178
<i>Atlas Data Privacy Corp., et al. v. Digital Safety Prods., LLC, et al.</i>	3:24-cv-4141
<i>Atlas Data Privacy Corp., et al. v. Claritas, LLC, et al.</i>	2:24-cv-4175
<i>Atlas Data Privacy Corp., et al. v. Data Axle, Inc., et al.</i>	3:24-cv-4181
<i>Atlas Data Privacy Corp., et al. v. Epsilon Data Mgt., LLC, et al.</i>	3:24-cv-4168
<i>Atlas Data Privacy Corp., et al. v. Labels & Lists, Inc., et al.</i>	2:24-cv-4174
<i>Atlas Data Privacy Corp., et al. v. Lusha Sys., Inc., et al.</i>	2:24-cv-4184
<i>Atlas Data Privacy Corp., et al. v. People Data Labs., Inc., et al.</i>	3:24-cv-4171
<i>Atlas Data Privacy Corp., et al. v. Scalable Commerce, LLC, et al.</i>	2:24-cv-4160
<i>Atlas Data Privacy Corp., et al. v. Civil Data Research, LLC, et al.</i>	3:24-cv-4143

<u>CASE CAPTION</u>	<u>CASE NUMBER</u>
<i>Atlas Data Privacy Corp., et al. v. Innovis Data Solutions, Inc., et al.</i>	3:24-cv-4176
<i>Atlas Data Privacy Corp., et al. v. Remine Inc., et al.</i>	2:24-cv-4182
<i>Atlas Data Privacy Corp., et al. v. TelTech Sys., Inc. et al.</i>	2:24-cv-4217
<i>Atlas Data Privacy Corp., et al. v. Corelogic, Inc., et al.</i>	2:24-cv-4230
<i>Atlas Data Privacy Corp., et al. v. PeopleConnect, Inc., et al.</i>	3:24-cv-4227
<i>Atlas Data Privacy Corp., et al. v. Black Knight Techs., LLC, et al.</i>	3:24-cv-4233
<i>Atlas Data Privacy Corp., et al. v. Choreograph LLC, et al.</i>	2:24-cv-4271
<i>Atlas Data Privacy Corp., et al. v. Equimine, Inc., et al.</i>	3:24-cv-4261
<i>Atlas Data Privacy Corp., et al. v. Trans Union LLC, et al.</i>	2:24-cv-4288
<i>Atlas Data Privacy Corp., et al. v. Zillow, Inc., et al.</i>	2:24-cv-4256
<i>Atlas Data Privacy Corp., et al. v. Melissa Data Corp., et al.</i>	2:24-cv-04292
<i>Atlas Data Privacy Corp., et al. v. Thomson Reuters Corp., et al.</i>	2:24-cv-4269
<i>Atlas Data Privacy Corp., et al. v. Equifax, Inc., et al.</i>	2:24-cv-4298
<i>Atlas Data Privacy Corp., et al. v. Restoration of America, et al.</i>	3:24-cv-4324
<i>Atlas Data Privacy Corp., et al. v. I360, LLC, et al.</i>	3:24-cv-4345
<i>Atlas Data Privacy Corp., et al. v. Spokeo, Inc., et al.</i>	2:24-cv-4299
<i>Atlas Data Privacy Corp., et al. v. Telnyx LLC, et al.</i>	2:24-cv-4354
<i>Atlas Data Privacy Corp., et al. v. Accuzip, Inc., et al.</i>	3:24-cv-4383
<i>Atlas Data Privacy Corp., et al. v. GoHunt, LLC, et al.</i>	2:24-cv-4380
<i>Atlas Data Privacy Corp., et al. v. Joy Rockwell Enterprises, Inc. d/b/a Posctardmania PCM LLC, et al.</i>	3:24-cv-4389
<i>Atlas Data Privacy Corp., et al. v. Fortnoff Financial LLC, et al.</i>	3:24-cv-4390
<i>Atlas Data Privacy Corp., et al. v. Myheritage Ltd., et al.</i>	3:24-cv-4392
<i>Atlas Data Privacy Corp., et al. v. Voterrecords.com, Inc., et al.</i>	3:24-cv-4385
<i>Atlas Data Privacy Corp., et al. v. Atdata, LLC, et al.</i>	2:24-cv-4447
<i>Atlas Data Privacy Corp., et al. v. E-merges.com, Inc, et al.</i>	2:24-cv-4434
<i>Atlas Data Privacy Corp., et al. v. Wiland, Inc., et al.</i>	3:24-cv-4442